



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

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July 6, 2020

**BY ECF**

Honorable Loretta A. Preska  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

The proposed schedule is approved.  
**SO ORDERED.**

Dated: July 7, 2020

Re: Suhail Laureano v. City of New York, et ano.  
17 CV 181 (LAP)

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**LORETTA A. PRESKA, USDJ**

Your Honor:

I am a Senior Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, and one of the attorneys representing defendants City of New York and Luis Linares in this matter. I write on behalf of the parties to respectfully request that the Court endorse the schedule proposed below for the submission of the additional pretrial submissions required by § 3(B) of Your Honor's Individual Practices.

The parties filed their proposed joint pretrial order on June 29, 2020. (See ECF No. 66.) By Order dated July 2, 2020, the Court scheduled the final pretrial conference for November 9, 2020 at 10:00 a.m.

Pursuant to the Court's Individual Practices, the parties' additional pretrial submissions—requests to charge, proposed *voir dire*, and motions *in limine*—are due on July 28, 2020. There are, however, significant evidentiary issues that need to be resolved before trial, so additional time is necessary in order to meaningfully address all such issues. Further, the additional time will also give the parties the opportunity to meet and confer to resolve some of those issues. Finally, the proposed schedule dictates that all pretrial submissions will be filed and fully briefed by mid-October, which will give the Court sufficient time to review them in advance of the final pretrial conference.

The parties therefore respectfully request that the Court endorse the following proposed schedule:

Requests to charge, proposed *voir dire*,  
and motions *in limine* filed on or before:

September 16, 2020

Oppositions to motions *in limine* filed  
on or before:

October 16, 2020

The parties thank the Court for its time and consideration of this matter.

Respectfully submitted,

*s/Philip R. DePaul*

Philip R. DePaul  
*Senior Counsel*  
Special Federal Litigation Division

cc: All Counsel (by ECF)